

BAS DE BLANK (S.B.N. 191487)  
 basdeblank@orrick.com  
 Lillian Mao (S.B.N. 267410)  
 lmao@orrick.com  
 ORRICK, HERRINGTON & SUTCLIFFE LLP  
 1000 Marsh Road  
 Menlo Park, California 94025  
 Telephone: (650) 614-7400  
 Facsimile: (650) 614-7401

Attorneys for Plaintiff  
 Robert Bosch Healthcare Systems, Inc.

Daniel W. McDonald (*Admitted Pro Hac Vice*)  
 dmcdonald@merchantgould.com  
 William D. Schultz (*Admitted Pro Hac Vice*)  
 wschultz@merchantgould.com  
 Eric Chad (*Admitted Pro Hac Vice*)  
 echad@merchantgould.com  
 MERCHANT & GOULD P.C.  
 3200 IDS Center  
 80 South Eighth Street  
 Minneapolis, Minnesota 55402-2215  
 Telephone: (612) 332-5300  
 Facsimile: (612) 332-9081

Adam R. Alper  
 Adam.alper@kirkland.com  
 KIRKLAND & ELLIS LLP  
 555 California Street, 27<sup>th</sup> Floor  
 San Francisco, CA 94104  
 Telephone: (415) 439-1400  
 Facsimile (415) 439-1500

Attorneys for Defendant CARDIOCOM LLC

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

ROBERT BOSCH HEALTHCARE  
 SYSTEMS, INC.,

Plaintiff,

v.

CARDIOCOM LLC,

Defendant.

CASE NO. 3:14-cv-01575-EMC

JOINT STIPULATION TO EXTEND  
 TIME TO REPLY REGARDING  
 MOTION TO LIFT STAY AND  
 CONTINUE HEARING DATE FOR  
 MOTION AND CASE MANAGEMENT  
 CONFERENCE

JOINT STIPULATION TO EXTEND TIME TO REPLY  
 REGARDING MOTION TO LIFT STAY AND CONTINUE  
 HEARING DATE FOR MOTION AND CASE MANAGEMENT  
 CONFERENCE

CASE No. 3:14-cv-01575-EMC

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Robert Bosch Healthcare Systems, Inc. (“Bosch”) and Defendant Cardiocom, LLC (“Cardiocom”) hereby submit this Joint Stipulation to Extend Time to Reply Regarding Motion to Lift Stay and Continue Hearing Date for Motion and Case Management Conference. The parties stipulate that Bosch’s reply brief regarding its Motion to Lift Stay (Dkt. 171) may be extended from January 26, 2017 to February 2, 2017. Bosch requests the extension so it can work with Bosch’s representatives in Germany to respond to Cardiocom’s opposition.

The hearings for Bosch’s Motion to Lift Stay and the Case Management Conference are currently scheduled for February 23, 2017 at 1:30. (Dkts. 171 and 173.) The parties stipulate and request that the Court continue the Case Management Conference to March 2, 2017 in order to accommodate a conflict of Cardiocom’s lead Counsel, Daniel McDonald of the Merchant & Gould firm related to a hearing scheduled in Minnesota.

The requested continuance shall not otherwise affect scheduling issues for the case. No previous extension of Bosch’s reply deadline has been requested or granted. The parties had previously requested to move the hearing date, but did not foresee the conflict of the new date.

IT IS SO STIPULATED, through counsel of record:

DATED: January 25, 2017

/s/ Bas de Blank  
Counsel for Plaintiff Robert Bosch Healthcare Systems, Inc.

DATED: January 25, 2017

/s/ Adam Alper  
Counsel for Defendant Cardiocom, LLC

**PURSUANT TO STIPULATION, IT IS SO ORDERED** that Bosch, Inc. shall have until February 2, 2017 to file its Reply regarding Motion to Lift Stay (Dkt. 171) and the hearings for that motion and the Case Management Conference are continued to March 2, 2017.

Dated: 1/27/2017



\_\_\_\_\_  
DISTRICT JUDGE

JOINT STIPULATION TO EXTEND TIME TO REPLY  
REGARDING MOTION TO LIFT STAY AND CONTINUE  
HEARING DATE FOR MOTION AND CASE MANAGEMENT  
CONFERENCE

CASE No. 3:14-cv-01575-EMC

**DECLARATION OF WILLIAM SCHULTZ**  
**IN SUPPORT OF JOINT STIPULATION TO EXTEND TIME TO REPLY REGARDING**  
**MOTION TO LIFT STAY AND CONTINUE HEARING DATE FOR MOTION AND CASE**  
**MANAGEMENT CONFERENCE**

1. I am an attorney for Cardiocom, LLC in this matter. The statements made herein are based on my personal knowledge and on information made available to me in the course of my duties and responsibilities for Cardiocom, LLC.

2. I corresponded with Bas de Blank, counsel for Bosch, Inc. regarding the hearing date for Bosch's Motion to Lift Stay and the Case Management Conference, both of which are currently scheduled for February 23, 2017. I requested that Bosch agree to continue the hearing date one week to March 2, 2017 based on a conflict relating to a hearing in another case scheduled in Minnesota. Bosch's counsel agreed to continue the hearing to March 2, 2017.

3. Bosch has requested a one week extension of time to file its reply regarding Bosch's Motion to Lift Stay. Bosch's reply is currently due January 26, 2017. The extension would make Bosch's brief due February 2, 2017. Cardiocom does not oppose Bosch's request.

4. The requested continuance and extension shall not otherwise affect scheduling issues for the case.

5. The parties have not previously requested an extension for Bosch to file its reply regarding Bosch's Motion to Lift Stay. The parties previously requested to move the hearing date based on other conflicts. The current request would move the hearings back one week, from February 23, 2017 to March 2, 2017.

1 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
2 is true and correct. Executed on January 25, 2017 at Minneapolis, MN.  
3

4 /s/ William Schultz  
5 William Schultz  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

**ATTESTATION OF CONCURRENCE IN FILING**

I Adam Alper, am the ECF User whose identification and password are being used to file this Joint Stipulation. In compliance with Local Rule 5-1(i)(3), I hereby attest that Bas de Blank of Orrick, Herrington & Sutcliffe LLP has concurred in this filing.

DATED: January 25, 2017

/s/ Adam Alper

**CERTIFICATE OF SERVICE**

I hereby certify that on January 25, 2017, a copy of the foregoing document is being electronically filed with the Clerk of the United States District Court for the Northern District of California by using the CM/ECF system, which will send notice of such filing to all counsel of record.

/s/Adam Alper